with the 25,000 cubic meters of TRU waste which is not required to be sent to WIPP.

Insufficient analysis of incineration requirements of TRU waste inventory. The DOE needs to explain in detail the purported need to send 25% of the waste to the incinerator. Since WIPP may not open in the near future, DOE should present a more realistic breakdown, of the waste volumes to be incinerated in order to meet RCRA and TSCA compliance, and present this as a part of another alternative. If there is doubt about the volume and waste characteristics of the retrievable TRU waste inventory, resulting in inaccurate estimates of the wastes requiring incineration, discussed above, then this would be a better project for DOE to start out with. This could then be followed by an EIS process to select the type and size of any future treatment facilities, be it driven by WIPP, RCRA, or TSCA.

Criticality Concerns - What are the impacts to health, and the safeguards to prevent, criticality events from compaction of pockets of concentrated TRU waste?

Air Quality Impacts

Section 4.7 -Air Resources

Secondary Aerosols - The DEIS fails to consider secondary aerosol formation from the precursor SO_2 and NOx emissions inventory. This may result in an under-estimation of ambient PM-10, adverse visibility impacts of nearby Class I airsheds, and under-estimation of the PSD increments for this EIS. A secondary aerosol analysis should be done, including precursor studies and monitoring, in order to accurately incorporate this contribution to PM-10 and PM-2.5, in the existing airshed, as well as that predicted during construction and operation of the proposed AMWTP facility. Given the fact that the main stack flues combine the off-gases of the incinerator, boilers, melters, VOCs, and diesel fumes, conditions are perfect for mixing of these off-gases to produce secondary aerosols.

The DEIS fails to include ambient air quality data. What are the maximum NOx, PM10, and SO_2 levels on-site and off-site? An independent analysis should be done to determine if ambient monitors are located at the correct locations to sample maximum pollution levels, both now, and also at the best location, in the event that the AMWTP is built.

DOE is relying almost totally on computer modeling, to determine the existing "background" ambient levels, rather than including additional monitors at the INEEL in order to reconcile these models. Likewise, DOE should include in the final DEIS (especially if the AMWTP is built) plans to site additional ambient monitors at locations where maximum emissions are expected. This would not only help directly determine health impacts, but also would also be useful to check the model accuracy and assess secondary aerosol impacts, and upset/malfunction air release at INEEL.